

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ABEC, INC.

Plaintiff

v.

EAT JUST, INC. AND GOOD MEAT, INC.

Defendants

NO. 5:23-cv-01091-WB

STIPULATION AND [PROPOSED] ORDER

WHEREAS, on February 14, 2024, after issuing a notice of subpoena and serving a copy of Defendants, EAT JUST, Inc. and GOOD MEAT, Inc. (the “Defendants”), Plaintiff, ABEC, Inc. (“ABEC”) duly served a Subpoena to Testify at a Deposition and produce documents on third-party, Midway Venture Partners, LLC (“Midway”);

WHEREAS, counsel for Midway and counsel for ABEC conducted numerous meet and confer sessions regarding the scope of the discovery pursuant to the Subpoena, and in an effort at compromise Midway offered to produce the digital files maintained for its investments in Eat Just and/or GOOD Meat, which ABEC accepted.

WHEREAS, counsel for Midway will designate the documents produced as “Confidential – Attorney’s Eyes Only” and produce them in electronic format to Plaintiff’s counsel with a standard upload file for Plaintiff to be able to access them on an e-discovery review tool, and Plaintiff agrees to make such documents available to Defendants.

WHEREAS, the Special Discovery Master has directed that counsel for Plaintiff shall maintain such production as Confidential - Attorneys’ Eyes Only whereby either Plaintiff or Defendants may seek to modify the designation within 30 days after the date of the production.

WHEREAS, if a change to the designation is sought by any party, Plaintiff agrees to provide 10 days notice of the proposed change to Midway's counsel for the specific document that may be at issue so that Midway's counsel can discuss the anticipated change and for Midway to consider seeking a protective order regarding the document(s) designation if it so chooses.

NOW, THEREFORE, Plaintiff ABEC and Third Party Midway, by and through their undersigned counsel, respectfully request that the Court order third-party, Midway, to produce the digital files maintained for its investments in Eat Just and/or GOOD Meat in accordance with the Subpoena within ten (10) days from the date of this Stipulation.

Respectfully submitted,

Dated: November 19, 2024

By: /s/ Peter Norman

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*Attorneys for non-party Midway Venture Partners,
LLC*

IT IS SO ORDERED.

Dated: 11/22, 2024

BY THE COURT:

/S/WENDY BEETLESTONE, J.

WENDY BEETLESTONE, J.